

**Note 1: Includes MCI numbering process proposal
with mediation January 18-20, 1994
FNF/94-002**

**Note 2: Primary international interface point and
feeder for U.S. State Dept. SGA**

Note 3: Ministerial Assignment Function

MCI Telecommunications

FNF/94-042
FNF/94-002

FNF FORUM

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TITLE: Numbering Process Proposal

ABSTRACT: This document is submitted to the Future of Numbering
Forum for discussion and acceptance to create a numbering
process to expedite industry resolution of issues dealing
with the assignment and administration of the NANP and
related numbering resources.

DATE: January 18-20, 1994

DISTRIBUTION TO: FNF Participants

This contribution is submitted to the Future of Numbering Forum for
the purpose of discussion and is not to be considered a binding proposal
on MCI Telecommunications. MCI reserves the right to modify or withdraw
this proposal at any time, for any reason.

1. INTRODUCTION

MCI proposes changes to the Future of Numbering Forum's (FNF's) process flow charts associated with North American Numbering Plan Administration and related activities.

Key elements proposed include:

- o A 12 Month Objective,
- o A Mediation Process, and
- o The Regulatory/Public Policy Process.

MCI's proposed process flow charts are attached and highlights are included in Section 2.

2. PROPOSAL HIGHLIGHTS

The proposed changes apply to the "Assignment Guideline Development Process", and the "Numbering Public Policy Process".

A. 12 Month Objective

1. Clock starts when issue is introduced at the industry numbering activity
2. Can be extended if reasonable near term conclusion is anticipated, mediation is not invoked, and parties agree

B. Mediation Process

1. Optional
2. Any party can invoke after 9 months of issue introduction
3. Costs paid by initiating party
4. Open issues will be compiled for mediator's consideration
5. All parties have right to present positions and supporting arguments
6. Rulings are binding on specific industry activity
7. Rulings will be used for the "Recommended Decision" output of the industry numbering activity
8. Individual participants retain the right to file a regulatory complaint at any time

C. Regulatory/Public Policy Process

1. Accepts or Rejects industry numbering activity recommended decision including mediation results
2. Notifies industry of disposition

3. FLOW CHART DISCUSSION

A. Chart 1: "Assignment Guideline Development Process":

This chart presents a process for the development of assignment guidelines and adopts much of FNF's previous work. It also introduces several new concepts.

1. Mediation: Introduction of an optional mediation process is one key new element. The incorporation of the proposed mediation process ensures that industry activities can be brought to a timely conclusion. Also, it is intended to reduce extensive regulator involvement while providing efficient means for regulatory oversight. The mediation option also provides an incentive to progress industry activities within a reasonable time frame.
2. "Recommended Decision" and "Regulatory 'Acceptance'": The adoption of the Recommended Decision/Regulatory "Acceptance" concept reduces the concern that the industry process sets defacto Public Policy. Hence, adopting this recommendation with explicit inclusion of the Regulatory "Acceptance" decision box provides a clear path and interface for regulatory involvement.

B. Chart 2/2A: "Number Administration Process"

These charts provide the same information previously developed at the FNF in a reformatted version.

C. Chart 3: "Numbering Public Policy Process"

This chart provides a flow chart for the Numbering Public Policy Process. The key elements are the "Mediation Process" and the "Recommended Decision"/"Regulatory 'Acceptance'" processes and concepts. As in the Assignment Guideline Development Process, the mediation process MAY be invoked by any participant, at its expense, and is binding on the industry numbering activity. Similarly, individual participants retain their right to appeal to the appropriate regulatory bodies regarding the results of the mediation process.

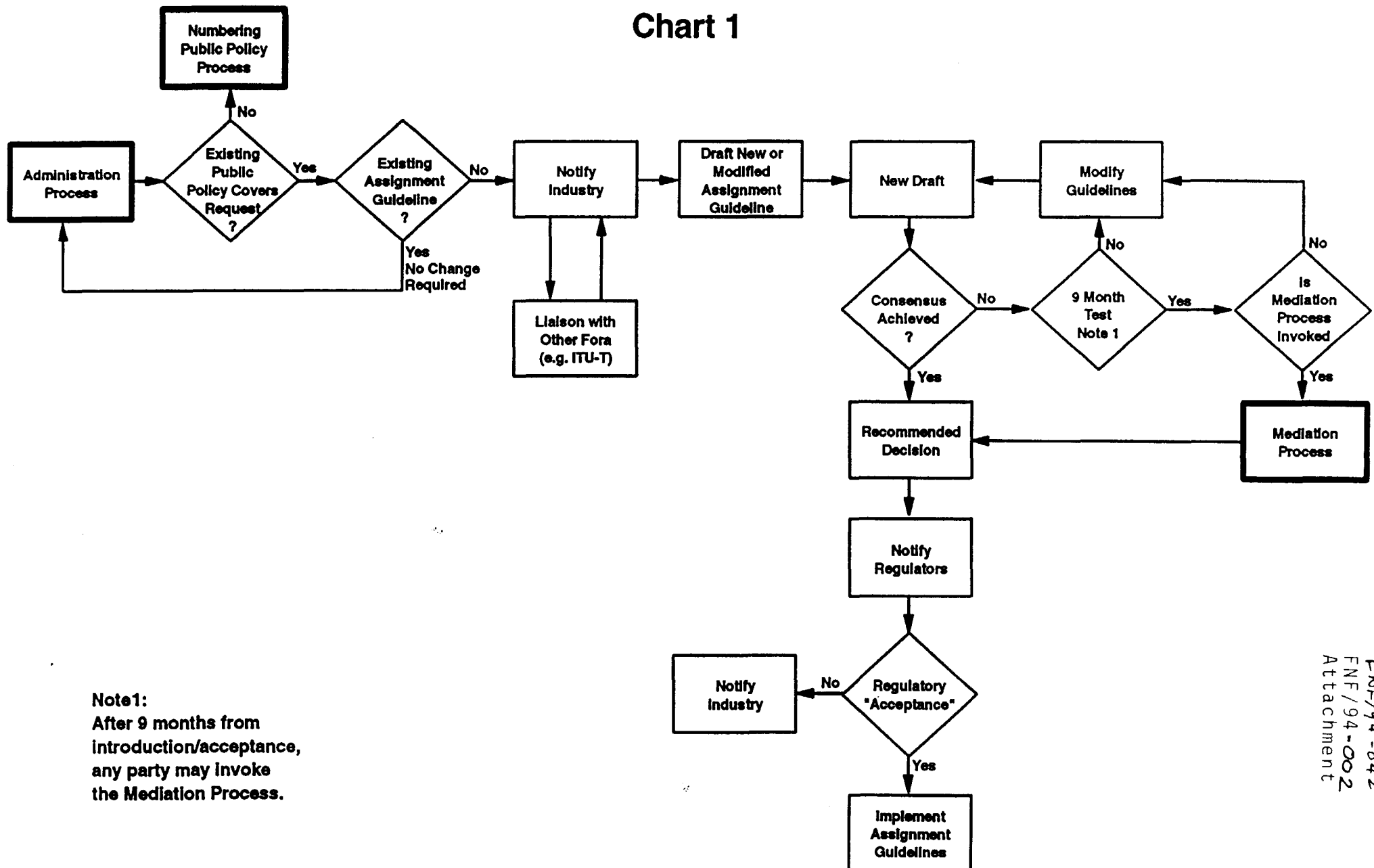
Again, with the concept of Recommended Decision/Regulatory "Acceptance", Chart 3 appropriately recognizes the role of the Regulator. The process suggested by this contribution explicitly places the Regulator in control of approving the proposed policy as opposed to just being informed of the industry's consensus opinion.

4. CONCLUSION

MCI urges the FNF to consider and accept the concepts included in this contribution. More detail regarding implementation and operational aspects of the "mediation process" can be developed by the FNF through either task force and/or individual contributions.

Assignment Guideline Development Process

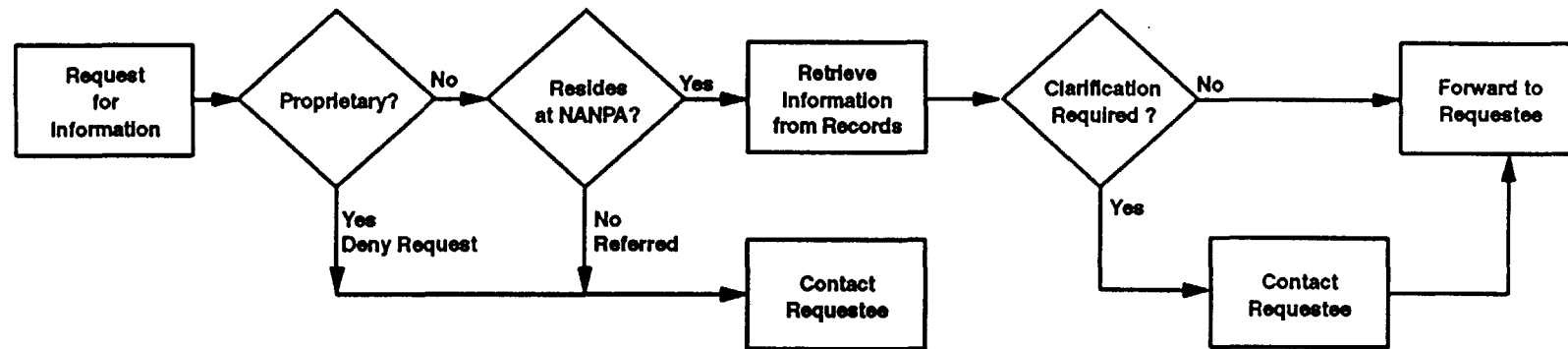
Chart 1



Note1:
After 9 months from introduction/acceptance, any party may invoke the Mediation Process.

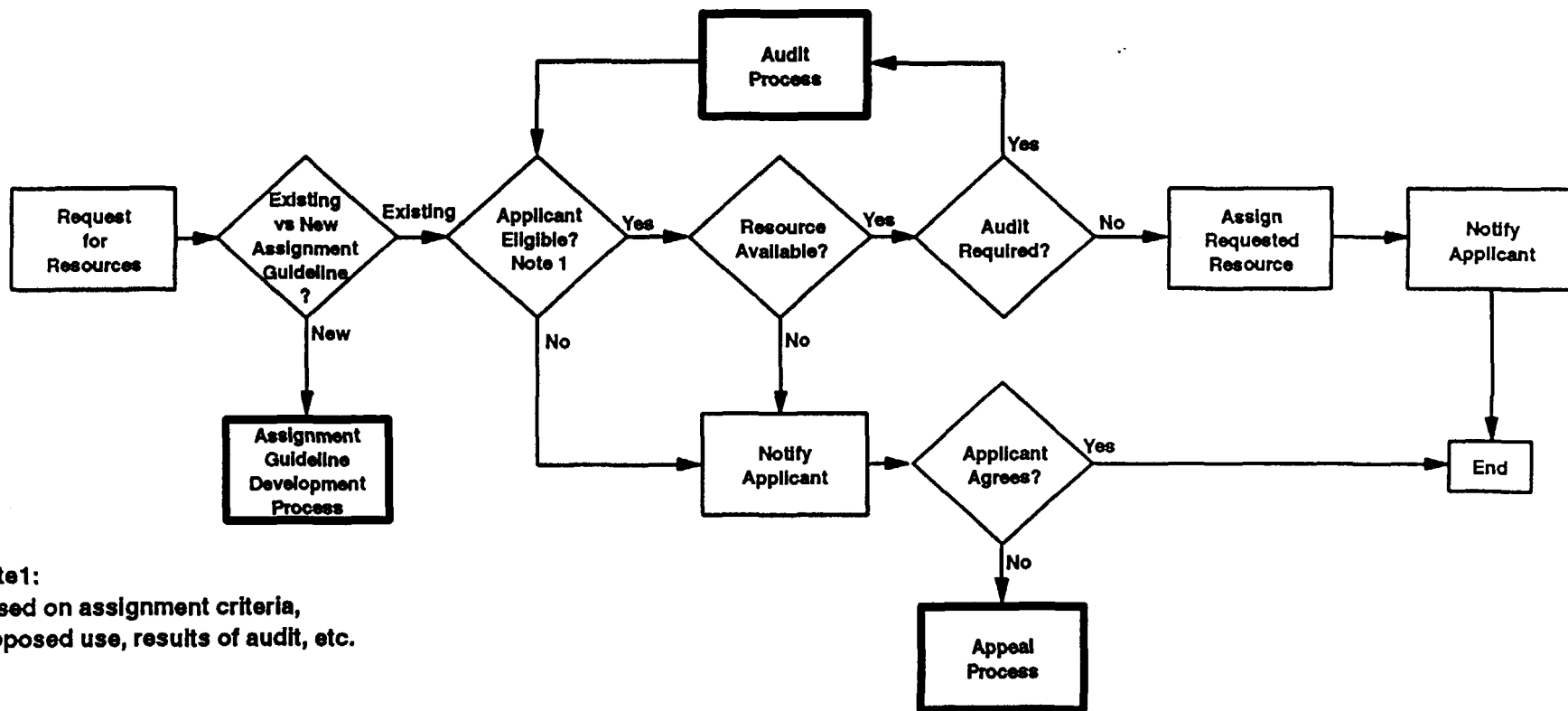
Numbering Administration Process

Chart 2



Numbering Administration Process

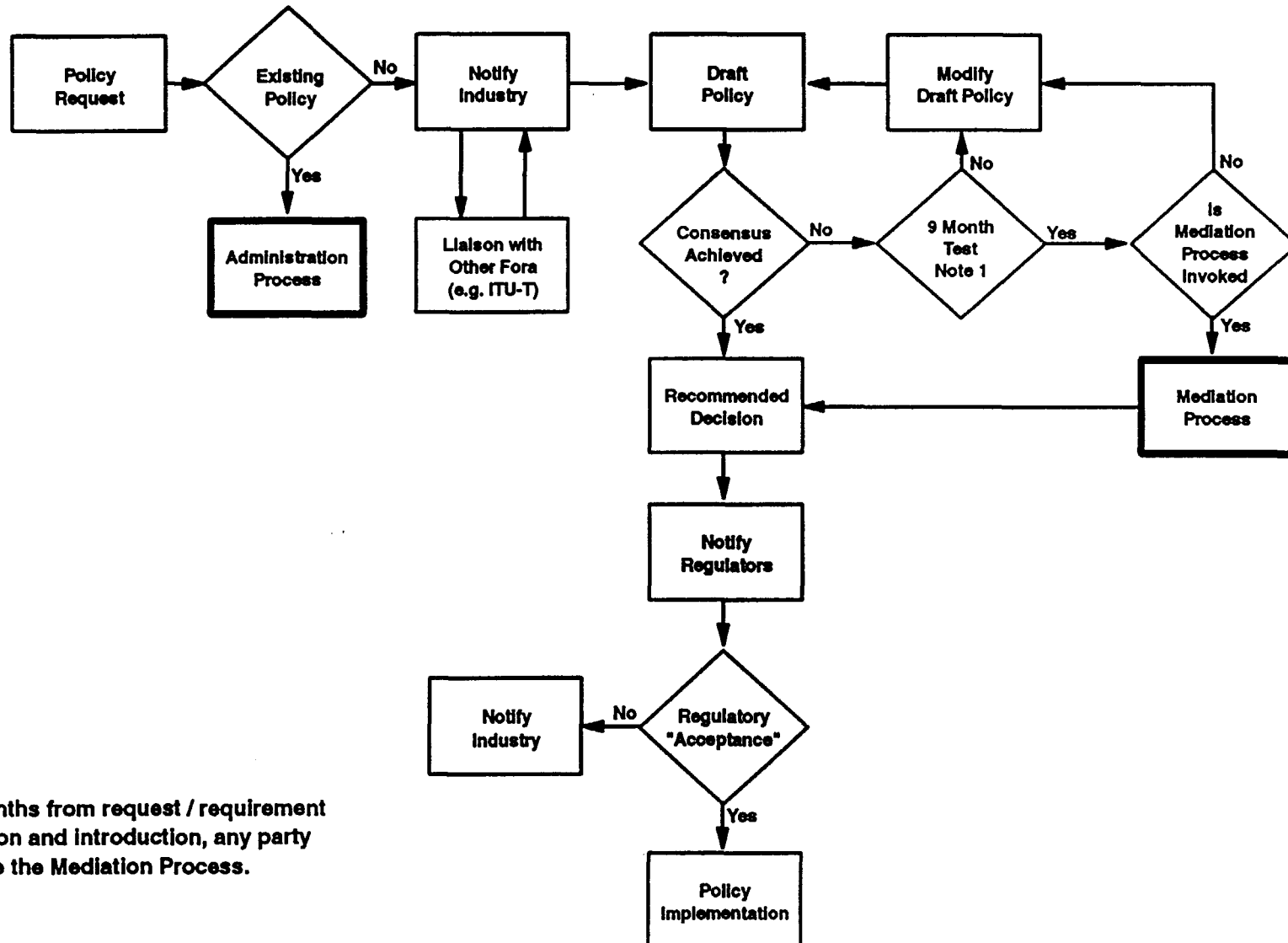
Chart 2A



Note1:
Based on assignment criteria,
proposed use, results of audit, etc.

Numbering Public Policy Process

Chart 3



Note1:

After 9 months from request / requirement identification and introduction, any party may invoke the Mediation Process.

ATTACHMENT B



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Corporation

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EX PARTE

May 27, 1993

Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: Petition for Rulemaking; North American Numbering Plan

Dear Ms. Searcy:

On May 6, 1993, a petition for rulemaking, in the form of a letter, was filed on the subject of the North American Numbering Plan, CC Docket No. 92-237, by the following parties: Ad Hoc Telecommunications Users Committee, California Bankers Clearing House Association, MasterCard International, Inc., New York Clearing House Association, Securities Industry Association, Consumer Federation of America, County of Los Angeles, Information Technology Association of America, International Communications Association, New York Consumer Protection Board, and Telecommunications Association (collectively, Petitioners). A copy of that letter is attached for your convenience.

These parties request that the Federal Communications Commission (Commission) institute a rulemaking proceeding to adopt an alternative to the North American Numbering Plan Administrator's (NANPA's) proposal -- as part of its implementation of the interchangeable numbering plan area codes -- to give local exchange carriers (LECs) the option to eliminate the use of the digit "1" as a toll call indicator. MCI Telecommunications Corporation (MCI) hereby supports their request.

One-plus-10-digit toll dialing is in the public interest. Maintaining 1+ ten-digit dialing will minimize customer confusion because the toll indicator will be maintained. Also, it will prevent the customer from inadvertently dialing a toll call that s/he assumes is a local call, and thereby will allow the customer complete control over whether to make the call or how long the call should be.

Donna R. Searcy
May 27, 1993
Page 2

The toll telephone dialing format in many jurisdictions takes the form of a 1+ or 0+ prefix followed by NPA-NXX-XXXX. In order to expand the NPA code resource, the NANPA is recommending that any digit be allowed as the middle digit in NPA codes, instead of just a 1 or 0. As a result, all telephone numbers would follow the format NXX-NXX-XXXX, in which the NPA and NXX codes would be interchangeable.

Under the proposal to implement interchangeable NPAs (INPAs), the LEC would have the option of requiring that all calls within the home NPA be dialed using seven digits while all calls to another NPA would be dialed using a 1-plus-10-digit format, regardless of whether the call is toll or nontoll.

For almost forty years, telephone users have been instructed to dial "1" before toll calls. Thus, the digit 1 has become a toll indicator for nearly all telephone users. The 1 prefix is intended to inform the calling party that, when the digit 1 is dialed before the called number, additional billing charges will accompany the call, except when the call is toll free such as a 1+800 call for which the caller does not pay a toll charge.

The NANPA proposal to allow carriers to drop the 1 and move to seven digit dialing will result in customer confusion as to which calls are local and which calls are toll. Instead of eliminating the toll indicator digit, MCI urges the Commission to propose for public comment the so-called Prefix Method, in which the caller dials a toll indicator digit of 1 or 0 plus ten digits to complete any toll call, whether inside or outside the "home" NPA; the caller would dial seven digits, or ten digits without the 1+ or 0+, only when making a local call. This, MCI submits, is the preferred dialing plan alternative when interchangeable NPA codes are placed into use in 1995.

It is beyond question that eliminating the toll indicator digit after almost forty years of instruction will result in customer confusion and, ultimately, dissatisfaction. In comments filed with Bellcore in April 1992, the Ameritech Regional Regulatory Committee, which includes public utility commissions or their staffs from Indiana, Ohio, and Wisconsin, wrote:

We are concerned about the elimination of the "1" prefix as a toll indicator. Many years and much money have been spent educating the public to use a "1" prefix when placing ten digit calls, since direct distance dialing was first introduced in 1951. This discussion appears to ignore the inconvenience and "confusion" that the user

Donna R. Searcy
May 27, 1993
Page 3

public may be subject to yet another different dialing plan.

Joint Comments/Concerns of the Ameritech Region Commissions regarding the Numbering Plan Administrator's Proposal, dated April 29, 1992, p. 6.

Some state utility commissions that have examined the issue of seven digit dialing have also noted the potential for customer confusion. The South Carolina Commission found that a LEC-sponsored plan to implement expanded area calling and implement seven digit dialing within that territory was not in the public interest. Specifically, the Commission found the following:

Because there would be no way to indicate to a customer that the seven-digit number that the customer was dialing was a toll call, a subscriber may not realize that he is in fact making a toll call and incurring long distance charges.

Order No. 92-802, Docket 92-163-C, p. 11 (Sept. 28, 1992). As a result, the Commission concluded that "the seven digit dialing arrangement ... could lead to substantial customer confusion." Id. Similarly, after several months of experience with seven digit dialing, the Louisiana Public Utilities Commission reversed a decision that permitted seven digit dialing within certain areas because "a number of the Commissioners have received numerous complaints from their constituents regarding the plan." Order No. U-17949-S, Docket No. U-17949 (Subdocket B), p. 1 (Feb. 10, 1992).

The customer confusion and dissatisfaction that will result from any switch to seven digit dialing will not necessarily be remedied simply by customer education. The South Carolina Commission addressed this point directly and found that putting information in the telephone directory about what calls are local and what calls are toll would require the customer to "know and have the availability of a telephone book to look up the information." Order No. 92-802, Docket No. 92-163-C, p. 12 (Sept. 28, 1992). That Commission found that this placed an "undue burden on the subscriber...." Id.

The Commission must consider that Bellcore, the current NANP Administrator, is owned by the Regional Bell Operating Companies (RBOCs). Bellcore's objectivity is called into question when it makes dialing plan recommendations that may affect local telecommunications services. The fact that the Bellcore/NANPA is proposing to give LECs the option of keeping the toll indicator or eliminating it demonstrates the NANPA's dilemma in trying to accommodate its owners. In attempting to appease the RBOCs who wish to take advantage of the implementation of interchangeable

Donna R. Searcy
May 27, 1993
Page 4

NPA's, NANPA has failed to take into consideration the views of commissions and consumer advocates.

The logical approach, from a consumer viewpoint, would have been for the NANPA to recommend one approach to be implemented uniformly across the country. As these Petitioners note, although it is possible for individual LECs and state public utilities commissions to adopt the Prefix Method dialing plan, unless such a plan is implemented on a uniform, national basis, consumer protection cannot be ensured. Moreover, whether the toll indicator should be maintained is a public interest (consumer) issue, not a technical or network issue; this clearly is not an issue on which the Commission should give deference to NANPA's recommendation.

Thus, MCI supports these Petitioners in requesting that the Commission expeditiously institute a rulemaking proceeding to require the use of the "1+" toll indicator when interchangeable NPAs are implemented.

Respectfully Submitted,

MCI Telecommunications Corporation



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Its Attorney

Attachment

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May 6, 1993

Donna R. Searcy
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Federal Communications Commission
1919 M Street, N.W.
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Washington, D.C. 20554

Re: **Ex parte Contact in CC Docket No. 92-237**
(Administration of the North American Numbering Plan)

Dear Ms. Searcy:

The undersigned parties are concerned about a very time-sensitive matter that has been raised in the above-referenced docket. Specifically, the parties ask that the Commission expeditiously initiate a Rulemaking for the purpose of adopting an alternative to Bellcore's plan to eliminate the use of the digit "1" as a toll call identifier as part of its implementation of "interchangeable" numbering plan area (INPA) codes. Bellcore's proposal would needlessly cost telephone customers more than \$1 Billion, cause substantial consumer confusion and potentially reduce intraLATA long distance service competition.

On January 1, 1995, Bellcore will begin assigning INPA codes to relieve the presently exhausted supply. Under the existing format, all area codes within the North American Numbering Plan (NANP) contain a "0" or a "1" as the middle digit; beginning in 1995, any number between 0 and 9 will be permitted. This will add approximately 640 new area codes to the NANP, more than four times the present quantity of 152 codes.

However, in addition to this change in the numbering system, the implementation of INPA will also entail a change in the dialing pattern in most parts of the country. Today, local and toll calls to points within the Home Numbering Plan Area (HNPA) are generally distinguished from one another by use of the prefix digit '1' on toll calls. However, once INPA is implemented, this pattern can no longer be used, because area codes and central

GARDNER, CARTON & DOUGLAS

Donna R. Searcy

May 6, 1993

Page 2

office codes will then both be of the same "NXX" format, and the prefix '1' will, under Bellcore's plan, be needed to distinguish between these two types of codes. Under INPA, all calls within the home area code, whether local or toll, would be dialed on a 7-digit basis,^{1/} and all calls to a different NPA, whether local or toll, would be dialed on an 11-digit (1-NPA-NXX-XXXX) basis.

In the past, the "1+" convention provided a convenient means for consumers to ascertain whether calling a particular number would entail a toll charge, and also afforded administrators of PBX systems a simple and consistent algorithm for implementing toll restriction in their systems. Under INPA, consumers will not be able to determine the charging status of a particular call unless they look up the code in the local telephone directory.^{2/} Similarly, a PBX will not be able to identify toll calls unless it has been modified to perform this type of screening function and maintains an up-to-date table of local (or toll) central office codes. Neither of these will happen without cost and administrative burden to the PBX manager. AT&T has recently quoted prices for modifying its PBX products at between a few hundred dollars to well over \$10,000, and this does not include the costs of maintaining code tables on an ongoing basis over time. A recent study conducted by the British Office of Telecommunications put the cost of premises equipment modifications to accommodate the forthcoming UK numbering change at nearly £200-million, which translates into more than \$1-billion after accounting for the size differences of the US and the UK.

Moreover, without the digit "1" as a toll identifier, consumers are not likely to know that they could pick a carrier other than the resident LEC to handle intraLATA toll traffic in LATAs in which toll competition has been authorized. As a consequence, intraLATA long distance competition will be adversely affected by Bellcore's INPA plan.

^{1/} An alternative arrangement, being considered in some states, would require HNPA toll calls to be dialed on an 11-digit basis, using the prefix '1' plus the home area code plus the 7-digit telephone number.

^{2/} That, of course, assumes that the code will be found there. Codes added after the current directory was printed will not appear until the following year's edition, assuming that all directories are printed annually.

GARDNER, CARTON & DOUGLAS

Donna R. Searcy

May 6, 1993

Page 3

The Ad Hoc Telecommunications Users Committee has devised an alternative to Bellcore's plan, which was presented to the FCC in the Committee's Comments in CC Docket No. 92-237, that would avoid nearly all of these costs and ongoing burdens. Under the plan described above, which the undersigned parties endorse, it will be possible to retain the 1+ prefix on all toll calls and to exclude it on all local calls, even those which cross an NPA boundary. The present dialing pattern currently in use in the Washington, DC metropolitan area demonstrates the feasibility of such an approach. The key to this arrangement is not to assign as CO codes the same sequence of digits associated with either the home or any adjacent NPA codes for which local rate treatment applies, and to require that all toll calls placed within the Home NPA be dialed on an 11-digit (1-HNPA-NXX-XXXX) basis.^{1/} Thus, as long as the 202, 703, and 301 codes are never used as CO codes within the Washington, DC metropolitan area, stored program control central offices can readily identify calls to these NPAs as local inter-NPA calls without the need for a prefix '1'.^{4/} While the C&P Telephone Company has adopted this dialing pattern for the present time, it is not a recognized approach within the Bellcore NANP standard, and may well be abandoned by C&P in its implementation of INPA. Yet because decisions as to the efficacy of any particular local dialing patterns are generally addressed solely at the state PUC level, the potential usefulness of this approach, which would permit full and unambiguous retention of

^{1/} The use of a nearby NPA code as a CO code is expressly discouraged so as to minimize the incidence of mis-dialed calls. See, Bellcore, BOC Notes on the LEC Networks - 1990, p. 3.8. Nevertheless, the Committee has identified a total of six (6) situations out of the more than 48,000 NPA-NXX codes presently in use in which a home or adjacent NPA is used as a CO code in that NPA. These are confined to three New York City codes (212-516, 718-718 and 718-917) and three Los Angeles codes (213-714, 818-818, and 818-909). In any event, these few codes can be reclaimed, and the impact upon the users of these six relatively new CO codes would be minimal by comparison with the benefit for all NANP users that would result from a uniform and coordinated toll/local identifier.

^{4/} Thus, when a Washington, DC customer dials 408 without a 1+ prefix, the central office will interpret that as a local CO code. But when the customer dials 703 without a 1+ prefix, the central office will interpret that code as the NPA for northern Virginia.

GARDNER, CARTON & DOUGLAS

Donna R. Searcy
May 6, 1993
Page 4

the 1+ prefix as an exclusive toll access digit, has never been formally considered as part of a national standard.

The Ad Hoc Committee plan would not only alleviate many of the operational concerns engendered by the implementation of interchangeable NPA codes, it would actually simplify the existing PBX administrative function. Under the present 1+NPA requirement that exists even for local calls in a number of areas (e.g., New York, Chicago, Los Angeles), the PBX must screen for local '1-NPA-NXX' sequences and pass such calls even where the prefix '1' had been dialed. Under the Ad Hoc Committee plan, toll calls would always require a prefix '1', and local calls would never require a prefix '1', even where the call is directed to a different NPA. The following table summarizes all possible combinations of local and toll, intra- and inter-NPA call dialing patterns under this scheme:

Local call, home NPA	7 digits	NXX-XXXX
Local call, foreign NPA	10 digits	FNPA-NXX-XXXX
Toll call, home NPA	11 digits	1-HNPA-NXX-XXXX
Toll call, foreign NPA	11 digits	1-FNPA-NXX-XXXX

where HNPA = 3-digit code for Home NPA;
FNPA = 3-digit code for Foreign NPA.

It is, of course, possible for individual LECs and state PUCs to adopt this type of dialing pattern, but unless it is implemented uniformly and nationally the larger consumer protection and end user system management concerns will go unaddressed.

Bellcore's plan will impose large and, for the most part, unnecessary costs and administrative burdens upon business telephone users and cause individuals to incur unintended toll charges. In order for telecommunications users to avoid these costs, however, action must be taken immediately to implement the type of dialing patterns advocated herein. As the cutover date for INPA approaches, users will necessarily have to incur costs in order to prepare themselves for the new dialing system. Any delay in establishing the proposal advocated herein as the accepted national standard would require that users incur costs on the possibility that the Bellcore approach will be placed into effect. It is thus essential that, to be effective, the Commission act promptly to promulgate this dialing plan in a rulemaking proceeding. The undersigned parties now jointly urge the Commission to initiate expeditiously a rulemaking which reflects the 1+ proposal reflected herein, and which the Ad Hoc

GARDNER, CARTON & DOUGLAS


Donna R. Searcy
May 6, 1993
Page 5

Telecommunications Users Committee has urged the Commission to begin.^{2/}

Respectfully submitted,

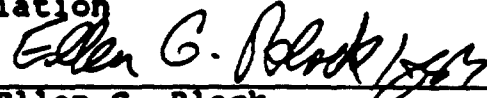
Ad Hoc Telecommunications Users
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^{2/} Ad Hoc Telecommunications Users Committee, Initial Comments (CC Docket No. 92-237) at 18-27, 37-38; Reply Comments (CC Docket No. 92-237) at 6-8, 15.

GARDNER, CARTON & DOUGLAS

Donna R. Searcy
May 6, 1993
Page 6

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GARDNER, CARTON & DOUGLAS

Donna R. Searcy
May 6, 1993
Page 7

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^{6/} The New York State Consumer Protection Board is an agency of the State of New York authorized and empowered to represent the interests of New York's consumers before, inter alia, Federal administrative and regulatory agencies. New York Executive Law §553 (3) (d).